ALABASTER CORP.

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May 19, 2010

Mr. Brian Harrison
CMS Category Manager
BP Exploration & Production
Gulf of Mexico – PSCM

Dear Mr. Harrison,
Although Ecotoxicity data for SEA BRAT #4 was included with the original submittal to the EPA in November 2002, it is our understanding there now is concern about the toxicity of two of the chemical components in SEA BRAT #4.

The two components of concern are nonylphenol ethoxylate and propylene glycol. The CAS numbers for these chemicals and the respective concentrations in the Sea Brat #4 product are:

Chemical	CAS#	Concentration
Propylene Glycol	000057-55-6	2.09%
Nonylphenol Ethoxylate	127087-87-0	1.91%

As a measure of relative toxicity, these two components were compared to the chemicals listed in Appendix B of 49 CFR 172.101 – List of Marine Pollutants. This is a list of marine pollutants established by IMO-MARPOL 73/787 and adopted by the United States that are considered particularly hazardous to aquatic plants and fish. Neither propylene glycol nor nonylphenol ethoxylate is included on this list as a Marine Pollutant or a Severe Marine Pollutant. In fact, according to the definitions in 49 CFR 171.8, even if a component of a mixture is on the list, it is not considered to be a Marine Pollutant unless it is present in the mixture at a concentration of ≥10% by weight.

One potential decomposition product of the nonylphenol ethoxylate is nonylphenol, which is actually listed as a Marine Pollutant. However, the concentration of the nonylphenol decomposition product would only amount to approximately 0.72% by weight in the mixture, and therefore, by definition would still be excluded as a Marine Polltutant. In addition, the concentration of these two components will be significantly diluted with sea water during and following the application.

Based on the relatively low concentrations of propylene glycol and nonylphenol ethoxylate in SEA BRAT #4 and the toxicity results for the SEA BRAT #4 product that was provided with the original submittal, we are confident there will be no ecological impact.

Sincerely,

C A Sheffield

Charles A. Sheffield
CEO- Alabaster Corporation

CAS / mg

6012427